



Decorative Hardwoods Association®

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March 28, 2024

Michal Freedhoff, Ph.D.
Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Ave. NW
Washington, DC 20460

RE: Formaldehyde: Draft Risk Evaluation Peer Review by the Science Advisory Committee on Chemicals (SACC); Notice of Availability, Public Meetings and Request for Comment (Docket EPA-HQ-OPPT-2023-0613); 89 Fed. Reg.18933 (Mar. 15, 2024)

Dear Assistant Administrator Freedhoff:

The Decorative Hardwoods Association (DHA)¹ requests that the agency extend the public comment period associated with the draft risk evaluation for formaldehyde under the Toxic Substances Control Act by 60-days. EPA noticed the availability of the draft evaluation on Friday, March 15 (89 Fed. Reg. 18933). Comments are due to EPA by May 14, 2024. DHA members use adhesives that may contain formaldehyde to manufacture hardwood plywood and engineered wood flooring. In addition, wood products and many other products naturally emit low levels of formaldehyde. Thus we have a strong interest in the draft risk assessment.

The draft TSCA evaluation is a very complex proposal. The various chapters are almost 1000 pages in length, which is not inclusive of the hundreds of additional supporting technical documents referenced therein. Reviewing the full breadth of these materials will take time. Affording an adequate period for such a review will likely support the development of substantive and informed comments. This will be of benefit to the agency as it determines how and whether to make amendments to the conclusions in the draft evaluation.

DHA believes that extending the comment period by an additional 60-days will provide organizations time to review the full extent of the draft evaluation and prepare responsive comments.

Thank you for considering our request for additional time. If you have any questions, please contact me at kchristman@decorativehardwoods.org or 703-435-2900.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith A. Christman".

Keith A. Christman
President
Decorative Hardwoods Association

¹ The Decorative Hardwoods Association represents over 75 North American manufactures of hardwood plywood, hardwood veneer, engineered wood floors and their suppliers and distributors.